UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ST. LOUIS CARDINALS, LLC Plaintiff, vs. DOUGLAS J. LEWIS d/b/a STL PRODUCTS Defendant.	))))))))))	No. 4:07-CV-473 (CEJ)

JOINT PROPOSED SCHEDULING PLAN

COME NOW the parties to this action and, pursuant to the Court's Order dated March 28, 2007, submit the following Joint Proposed Scheduling Plan:

1. A Track 2 (Standard) assignment is appropriate.

2. The parties must file all motions for joinder of additional parties and amendment of pleadings by July 16, 2007.

3. Discovery plan

a. The parties shall make the disclosures required by Fed. R. Civ. P. 26(a)(1) by May 31, 2007.

b. Discovery shall not be conducted in phases or limited, except as set forth below.

c. The presumptive limits of ten (10) fact witness depositions per party as set forth in Fed. R. Civ. P. 30(a)(2)(A) and twenty-five (25) interrogatories per party as set forth in Fed. R. Civ. P. 33(a) should apply in this case.

d. No physical or mental examinations of parties are necessary in this case.

e. The parties do not presently anticipate any issues relating to disclosure or discovery of electronically stored information, including the form or forms in which it should be

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produced.

4. The parties intend to conduct settlement discussions directly at the present time without the assistance of a mediator. The parties will notify the Court in the future should they believe that the assistance of a mediator would be helpful.

5. Expert Discovery

a. Each party shall disclose its expert witnesses' identities and provide the reports required by Fed. R. Civ. P. 26(a)(2), by September 7, 2007.

b. Each party shall disclose its rebuttal expert witness' identities and provide their reports, by October 5, 2007.

c. Each party shall make their respective experts available for deposition by November 16, 2007.

d. All discovery, including expert discovery, shall be completed by November 16, 2007.

6. Dispositive motions shall be filed by January 10, 2008.

7. The case should reasonably be expected to be ready for trial by April 14, 2008.

8. The parties estimate that the case will take approximately three (3) days to try.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 26th day of April 2007, a true and accurate copy of the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following persons:

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